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January 4, 2018

**Via ECF Only**

Magistrate Judge Daniel J. Stewart  
United States District Court NDNY  
James T. Foley U.S. Courthouse  
445 Broadway  
Albany, NY 12207

Re: Cinthia Thevenin v. City of Troy, et al.  
Docket No.: 1:16-cv-1115(NAM/DJS)  
Our File No.: 11166-0001

Dear Judge Stewart:

As the Court is aware, the fact discovery deadline in the above matter is set for January 12, 2018. At this juncture, parties anticipate needing additional time to conclude discovery as there are multiple outstanding discovery issues that have yet to be resolved, including the following: (1) motion to unseal Grand Jury minutes pending before J. Nichols in Columbia County Supreme Court; (2) Plaintiff's letter motion (Docket No. 49); (3) outstanding disclosure of the Precision Simulations, Inc. Report ("PSI Report") by the New York State Office of the Attorney General, which is scheduled to be disclosed by January 16, 2018; (4) additional non-party depositions that may be scheduled based on the outcome of the pending motions and disclosure of the PSI Report; and (5) outstanding paper discovery based on recent depositions and developments in this matter.

In light of the foregoing, I am writing to request an extension of the discovery deadline to March 31, 2018, as discussed at the telephone conference of November 28, 2017. Plaintiff's counsel joins in this request.

We appreciate the Court's indulgence in this matter.

Respectfully submitted,

Asish A. Nelluvely

cc: Michael A. Rose, Esq., Hach & Rose LLP (*via ECF only*)  
Neil S. Torczyner, Esq., Harfenist Kraut & Perlstein LLP (*via ECF only*)